

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 22, 2016

Jimmie Cho, Senior Vice President
Gas Operations and System Integrity
Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

GI-2015-06- SCG59-02A

Subject: General Order (G.O.) 112¹ Operation and Maintenance Inspection of Southern California Gas Company's Cathodic Protection Facilities in the Orange North Distribution System

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112¹ Operation and Maintenance Inspection of Southern California Gas Company's (SCG) Cathodic Protection (CP) Facilities in the Orange North (Inspection Unit) on June 8-12, 2015. The inspection included a review of the Inspection Unit's cathodic protection and odorant records for calendar years 2013 and 2014 and random field inspections of pipeline facilities in Bakersfield and Visalia districts. SED staff also reviewed the Inspection Unit's Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED staff did not identify any probable violation of G.O. 112¹, Reference Title 49 Code of Federal Regulations (CFR), Part 192 during the course of this inspection. However, SED found several concerns as described in the "Summary of Inspection Findings", which is enclosed with this letter.

Please provide a written response within 30 days of receipt of this letter indicating any updates or corrective actions taken by SCG.

If you have any questions, please contact Durga Shrestha, at (213) 576-5763.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno
Program Manager
Safety and Enforcement Division

CC: Durga Shrestha, SED/GSRB
Alula Gebremedhin, SED/GSRB
Sikandar Khatri, SED/GSRB
Kan Wai Tong, SED/GSRB
Jeff Koskie, Sempra

¹ General Order 112-F was adopted by the Commission on June 25, 2015 via 15-06-044

**Summary of Inspection Findings
2015 SCG Orange North Inspection
June 8 - 12, 2015**

I. Concerns, Recommendations, and Observations Summary

1. §192.463 (a) External corrosion control: Cathodic protection.

“Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in [Appendix D](#) of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.”

During field inspection of CP facilities, SED observed that the pipe-to-soil reads at the following location as shown in the table were out of tolerance (low P/S reads) from its -0.850 volts criteria:

Area	Point	District	Read, V	Criteria
00367-4A	D	La Jolla	-0.545	-0.850 V
00377-2A	J	La Jolla	-0.586	-0.850 V
00377-2A	P	La Jolla	-0.593	-0.850 V
00622-4A	A	La Jolla	-0.670	-0.850 V
00622-4A	B	La Jolla	-0.640	-0.850 V
00706-3A	C	La Jolla	-0.847	-0.850 V
00706-3A	E	La Jolla	-0.840	-0.850 V
00825-2A	B	La Jolla	-0.839	-0.850 V
00825-2A	C	La Jolla	-0.820	-0.850 V
00412-3B	V	Anaheim	-0.567	-0.850 V
00510-3A	C	Anaheim	-0.748	-0.850 V
00631-1A	C	Anaheim	-0.834	-0.850 V
00631-1A	D	Anaheim	-0.830	-0.850 V
00464-2B	Q	Anaheim	-0.835	-0.850 V
00464-2B	R	Anaheim	-0.801	-0.850 V
LA-0573-1-B	T	Whittier	-0.705	-0.850 V
LA-0573-1-B	W	Whittier	-0.772	-0.850 V
LA-0673-3-B	B	Whittier	-0.465	-0.850 V
LA-0673-3-B	C	Whittier	-0.460	-0.850 V
00296-4A	C	Whittier	-0.720	-0.850 V
00296-4A	H	Whittier	-0.672	-0.850 V
C-0743-E-C	I	Whittier	-0.729	-0.850 V
C-0649-E-A	B	Downey	-0.566	-0.850 V
C-0766-E-B	B	Downey	-0.523	-0.850 V
C-0872-E-E	L	Downey	-0.837	-0.850 V
SL-C0825-EC	G	Downey	-0.724	-0.850 V

Also, the test points under CP 10% inspection cycles indicated low reads as well.

Address	Region	District	Read, V	Criteria
909 N. Main St, Santa Ana	Southeast	Anaheim	-0.140	-0.850 V
13461 Jetmore Ave, Paramount	Southeast	Downey	-0.395	-0.850 V
15919 Orizaba Ave, Paramount	Southeast	Downey	-0.407	-0.850 V

SED directs SCG to take necessary remediation actions, so that SoCalGas can restore the cathodic protection to the affected sections and comply with 49 CFR §192.463.

2. §192.465 (d) External corrosion control: Monitoring

“Each operator shall take prompt remedial action to correct any deficiencies indicated by the monitoring.”

During the records review, SED found that SoCalGas crew found a CP package 00860-1A down on May 05, 2014 and noted that the anode was depleted at ECS #1. On May 30, 2014, crew decided to install new anodes at ECS #1. SoCalGas’ Maintenance Sheet showed that the permit for installation of anode was submitted to the County of Orange on June 10, 2014. On July 23, 2014, it was found that the permit was delayed because the county required a Traffic Control Plan. However, the maintenance sheet did not indicate the submittal of the Traffic Control Plan to the county. On May 4, 2015, it showed that the area was up. Apparently, the Traffic Control Plan was not needed during the permitting process. However, the affected CP package was receiving insufficient cathodic protection for almost a year. Therefore, SED recommends SoCalGas take prompt remedial actions to address its cathodic protection deficiencies without delay.

3. §192.465 (c) Atmospheric corrosion control: Monitoring

“If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by Sec. 192.479.”

During the field inspection, SED found severe atmospheric corrosion at the following locations:

- i) Riser at 5328 Magnolia Terrace, Whittier
- ii) Service line branch at 909 N. Main St, Santa Ana

Therefore, SED recommends SCG take prompt remediation.